REMARKS

Claims 1-7 are pending in the application. Applicant amends claim 1 for clarification, and refers to Fig. 4 and its corresponding description in the specification for an exemplary embodiment of and support for the claimed invention. No new matter has been added.

Applicant, again, acknowledges with appreciation the Examiner's finding that claims 4-5 contain allowable subject matter. Applicant submits that claim 1, from which claims 4-5 depend, is patentable over the reference cited against it, as demonstrated below. Accordingly, Applicant requests that the Examiner allow claims 4-5.

Claims 1 and 6-7 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 7,085,827 to Ishizaki et al.; and claims 2-3 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Ishizaki et al. in view of U.S. Patent Application Publication No. 2003/0189936 to Terrell et al. Applicant amends claim 1 in a good faith effort to clarify the invention as distinguished from the cited references, and respectfully traverse the rejections.

The Examiner cited and relied upon Fig. 5 of Ishizaki et al. as disclosure of the claimed lookup table and linked pair features. The column "VPN ID" shown in Fig. 5 of Ishizaki et al. is a VPN identifier attached to a packet received from a "Site." The column "Address 1" is an IP address of a client (132). The column "Address 2" is an IP address of a VPN router (165). The column "Protocol" is a communication protocol for VPN communications. The column "Internet" indicates enabling/disabling the routing of a packet received from the "Site" to an external network. And the column "VLAN ID" is a VLAN tag value attached to VLAN switch (170) in transmission. Thus, even if some adjacent entries of the table illustrated in Fig. 5 of Ishizaki et al. may appear sequentially concatenated, a sequence of these entries would not and could not specify an up-directional or down-directional connection path. And Ishizaki et al., as cited and relied upon by the Examiner,

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therefore, at least fails to disclose the claimed feature of "a sequence of ... linked pairs of tags and destination addresses is configured to specify an up-directional connection path of [a] packet from a client side to a server side or a down-directional connection path of the packet from the server side to the client side."

In other words, Ishizaki et al., as relied upon by the Examiner, fail to disclose,

> "[a] connection management apparatus for connecting a plurality of physically connectable network devices based on connection paths set for individual users, comprising:
>   a client port connectable to the users via a network;
>   a server port connectable to a server;
>   a lookup table including one or more *linked pairs* of tags and destination addresses, each of said *linked pairs* indicating a user and a next destination of a received packet by using a tag attached to the received packet as a search key wherein said attached tag indicates a user and a destination; and
>   a tag replacement and transmission part replacing a tag of the received packet with a tag detected from the lookup table and transmitting the resulting packet to a destination address detected from the lookup table;
>   wherein a packet received from one of the users and the server is transmitted to one of the plurality of network devices and a packet received from one of the plurality of network devices is transmitted to one of the plurality of network devices, the server and the users, and a sequence of the linked pairs of tags and destination addresses is configured to specify an up-directional connection path of the packet from a client side to a server side or a down-directional connection path of the packet from the server side to the client side," as recited in claim 1. (Emphasis added)

Applicant refers the Examiner to Fig. 4 and its corresponding description in the specification for an exemplary embodiment of the claimed invention. As shown in Fig. 4, for example, each entry or row (a1, a2, ..., a8; b1, b2, ...; c1, c2, ...) of the destination search table is linked with its adjacent upstream and downstream entries. Thus, the sequence of entries "a1-a5" is configured to specify a path from the client side to the final destination server side (up-directional routing path). And the sequence "a6-a8" is configured to specify a path from the final destination server side to the client side (down-directional routing path).

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Accordingly, Applicant respectfully submits that claim 1, together with claims 6-7

dependent therefrom, is patentable over <u>Ishizaki et al.</u> for at least the above-stated reasons.

The Examiner relied upon <u>Terrell et al.</u> as a combining reference to specifically address the

additional features recited in dependent claims 2-3. As such, the addition of this reference

would still have failed to cure the above-described deficiencies of <u>Ishizaki et al.</u>, even

assuming, <u>arguendo,</u> that such an addition would have been obvious to one skilled in the art

at the time the claimed invention was made. Accordingly, Applicant respectfully submits

that claims 2-3 are patentable over the cited references for at least the foregoing reasons.

In view of the remarks set forth above, this application is in condition for allowance

which action is respectfully requested. However, if for any reason the Examiner should

consider this application not to be in condition for allowance, the Examiner is respectfully

requested to telephone the undersigned attorney at the number listed below prior to issuing a

further Action.

Any fee due with this paper may be charged to Deposit Account No. 50-1290.

Respectfully submitted,

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